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Attorneys for Defendants Global Allies, LLC,  
Isaac Kubryk, and David Cline

IN THE UNITED STATES DISTRICT COURT  
IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA

KINGSLEY-BATE LTD., a Delaware Corporation

Plaintiff,

V.

GLOBAL ALLIES, LLC, a California  
Limited Liability Company, ISAAC  
KUBRYK, an individual, and DAVID  
CLINE, an individual

Defendants.

No. CIV.S 04-1268 MCE JFM

**STIPULATED REQUEST AND  
ORDER RE CONTINUANCE OF NON-  
EXPERT DISCOVERY CUT-OFF  
DATE**

The parties hereto, through their respective counsel of record, hereby submit this stipulated request that the cut-off date for non-expert discovery, November 25, 2005, as set forth in this Court's Pretrial (Status) Scheduling Order filed March 16, 2005, be continued by 90 days, through and including February 24, 2006. The parties are not requesting a continuance of any other date. The date set for trial is August 30, 2006.



Good cause exists for the extension in that the parties have agreed to the terms of a settlement of this action and need the additional time to prepare and finalize settlement documents, without having to engage in the extensive amount of discovery that remains.

Dated: October 4, 2005

**WEINTRAUB GENSHLEA CHEDIAK**  
Law Corporation

By: /S/ Audrey A. Millemann  
Audrey A. Millemann  
State Bar No. 124954

Attorneys for Defendants

Dated: October 4, 2005

**ASKEW & ARCHBOLD**  
A Professional Corporation


By: /S/ James A. Askew  
James A. Askew  
State Bar No. 60469

Attorneys for Plaintiff

## ORDER

IT IS HEREBY ordered that the date for non-expert discovery cut-off be extended from November 25, 2005 to February 28, 2005.

Dated: October 12, 2005

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE